

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

:

KATIE MILLIO, IRENE JOHNSON	)	
JANINE HELLER and TOMAYITA	)	
STEVENSON,	)	DOCKET NO. 04-cv-30130
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
ULTRASOUND DIAGNOSTIC SCHOOL	)	
WHITMAN EDUCATION GROUP,	)	
CAREER EDUCATION CORP.,	)	
and LOUIS GIANNELLI,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANTS**  
**ULTRASOUND DIAGNOSTIC SCHOOL, WHITMAN EDUCATION GROUP AND**  
**CAREER EDUCATION CORPORATION**  
**AND REQUEST FOR HEARING**

The plaintiffs hereby move to compel adequate responses to written discovery served upon defendants Ultrasound Diagnostic School, Whitman Education Group and Career Education Corporation, on or about April 14, 2005. As grounds therefore, the plaintiffs submits their Memorandum in support of this motion, and state that the defendants failed to respond adequately to written requests for discovery as follows: Interrogatories 1,2, 11, 13, 19, 20; and Document Requests 24-30, 36-37, and 42.

WHEREFORE, the plaintiffs request that this court:

1. Order the defendants to respond completely and fully to Interrogatories 1,2, 11, 13, 19, 20; and Document Requests 24-30, 36-37, and 42 within ten days; and

2. Award the plaintiffs their reasonable attorney's fees and costs in prosecuting this motion.

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) and 37.1(B)

I certify that I have attempted in good faith to resolve or narrow the issues raised in this motion at a discovery conference, and have not been able to reach agreement on any discovery request noted in this Motion.

I hereby certify that a  
true copy of the above  
document was served upon  
the defendants' attorney  
by mail (by hand) on

\_\_\_\_\_.

\_\_\_\_\_

Dated: \_\_\_\_\_

THE PLAINTIFFS

By their attorneys,

\_\_\_\_\_  
Joel Feldman

BBO # 552963

Suzanne Garrow

BBO # 636548

Heisler, Feldman & McCormick

1145 Main Street, Suite 508

Springfield MA 01103

(413)788-7988

(413)788-7996 (fax)